

## **EXHIBIT 4**



## United States Department of Justice

### United States Attorney's Office Central District of California

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1300 United States Courthouse  
312 North Spring Street  
Los Angeles, California 90012

December 16, 2022

#### **VIA EMAIL AND INTEROFFICE DELIVERY**

Georgina Wakefield  
Gabriela Rivera  
Julia Deixler  
Deputy Federal Public Defenders  
321 East 2<sup>nd</sup> Street  
Los Angeles, California 90012

Re: United States v. Jerry Nehl Boylan,  
CR No. 22-482-GW

Dear Counsel:

Pursuant to your request for discovery, we are producing additional discovery materials that have been bates numbered BOYLAN\_00331172 thru BOYLAN\_00331357. A discovery production index is enclosed for your ease of reference. Today's production is being provided to you in an encrypted USB thumb drive and the password to access these materials will be e-mailed to you separately.

These materials include additional FBI investigative reports regarding the review of digital devices recovered from the *Conception* wreckage, including devices recovered by the FBI investigative search team and devices recovered during the memorial dive that took place on the anniversary of the *Conception* boat fire. Where such was possible, the materials also include the results of forensic analysis, including analysis of a digital device recovered from the *Conception* wreckage that was recently determined to be salvageable for further review and for which the government obtained an additional search warrant. Please let us know immediately if you have any issues opening or viewing any of the files in the thumb drive.

The government will make available for your inspection any item of evidence referred to above, as well as any other evidence seized from your client and/or which the government intends to offer in its case-in-chief. Please contact us to arrange a mutually convenient for your inspection of such items.

The government will produce to you any additional Jencks material—including any relevant grand jury transcripts, assuming a Rule 6(e) order has been issued—one week before trial if you

Wakefield / Rivera / Deixler  
Deputy Federal Public Defenders  
RE: United States v. Jerry Boylan, CR No. 22-482-GW  
December 15, 2022  
Page 2

agree to the production of reciprocal Jencks material at that time or affirmatively represent that you have no Jencks material to produce. Please inform us whether such an arrangement is acceptable to you.

The government also hereby gives notice that it may seek to introduce the other crimes, wrongs, or acts committed by your client that are referenced in the enclosed items pursuant to Rules 404(b) and/or 609(b) of the Federal Rules of Evidence. The government will provide a more detailed discussion of the Rule 404(b) evidence at a later date. This notice does not waive or relinquish the government's right to introduce the evidence described herein under any other applicable rule or principle of law.

These materials and any future discovery provided to you that may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law are provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations.

With this letter the government requests all reciprocal discovery to which it is entitled under Rules 16(b) and 26.2 of the Federal Rules of Criminal Procedure. The government also requests notice of any intention of your client to rely on an entrapment defense, or a defense involving mental condition or duress, and/or an alibi defense. Pursuant to Federal Rule of Criminal Procedure 12.1, the dates, times, and places of the charged offenses are detailed within the documents included within the discovery. Please contact us immediately if you believe that this notice is insufficient.

Please let us know if you have any questions or would like to further discuss any of the matters raised above.

Very truly yours,

/s/

MARK A. WILLIAMS  
MATTHEW W. O'BRIEN  
BRIAN R. FAERSTEIN  
Assistant United States Attorneys

Enclosures: USB Thumb Drive  
Discovery Production Index (Prod\_015)

PROD_BEGDOC	PROD_ENDDOC	FILENAME
BOYLAN_00331172	BOYLAN_00331173	S526 Civil Site Visit 8.9.22 - 8.12.22.pdf
BOYLAN_00331174	BOYLAN_00331174	S527 Consent 1519.pdf
BOYLAN_00331175	BOYLAN_00331176	S527_1A396_1_Consent Form.pdf
BOYLAN_00331177	BOYLAN_00331177	S528 SW 302 for 1B290.pdf
BOYLAN_00331178	BOYLAN_00331178	S529 Recovery of Two Phones on Annivesary.pdf
BOYLAN_00331179	BOYLAN_00331183	S529_1A398_1_SBSO Report.pdf
BOYLAN_00331184	BOYLAN_00331185	S530 FPD Evidence Review.pdf
BOYLAN_00331186	BOYLAN_00331186	S531 Request for EDAU to Return Devices.pdf
BOYLAN_00331187	BOYLAN_00331191	S531_1A399_1_HQQ191205005 Report.pdf
BOYLAN_00331192	BOYLAN_00331194	S531_1A399_2_HQQ190927003 Report.pdf
BOYLAN_00331195	BOYLAN_00331196	S531_1A399_3_HQQ190913003 Report.pdf
BOYLAN_00331197	BOYLAN_00331199	S531_1A399_4_HQQ190927003_Report 2.pdf
BOYLAN_00331200	BOYLAN_00331201	2_pages_of_hand_written_notes (Memorial Dive).pdf
BOYLAN_00331202	BOYLAN_00331213	Apple iPhone (Physical)_2022-10-13_Report_2022-10-16_Report.pdf
BOYLAN_00331214	BOYLAN_00331214	2019-09-02 02:50:38 UTC: Unknown-Party-6cce6cc4-04da-4f2a-a946-f7a42b5bca76 -> []
BOYLAN_00331215	BOYLAN_00331215	IMG_2622.JPG
BOYLAN_00331216	BOYLAN_00331216	[Unnamed Log]
BOYLAN_00331217	BOYLAN_00331217	IMG_2628.JPG
BOYLAN_00331218	BOYLAN_00331218	IMG_2614.JPG
BOYLAN_00331219	BOYLAN_00331219	IMG_2615.JPG
BOYLAN_00331220	BOYLAN_00331220	IMG_2629.JPG
BOYLAN_00331221	BOYLAN_00331221	IMG_2621.JPG
BOYLAN_00331222	BOYLAN_00331222	IMG_2620.JPG
BOYLAN_00331223	BOYLAN_00331223	IMG_2622.JPG
BOYLAN_00331224	BOYLAN_00331224	IMG_2623.JPG
BOYLAN_00331225	BOYLAN_00331225	IMG_2627.JPG
BOYLAN_00331226	BOYLAN_00331226	IMG_2626.JPG
BOYLAN_00331227	BOYLAN_00331227	IMG_2624.JPG
BOYLAN_00331228	BOYLAN_00331228	IMG_2619.JPG
BOYLAN_00331229	BOYLAN_00331229	IMG_2625.JPG
BOYLAN_00331230	BOYLAN_00331230	IMG_2614.JPG

CR 22-482-GW

Production Date: 12-16-2022

Production 015 (v036)

Local File Production	BOYLAN_00331231	BOYLAN_00331231	IMG_2615.JPG	Discovery Index
	BOYLAN_00331232	BOYLAN_00331232	IMG_2619.JPG	
	BOYLAN_00331233	BOYLAN_00331233	IMG_2620.JPG	
	BOYLAN_00331234	BOYLAN_00331234	IMG_2621.JPG	
	BOYLAN_00331235	BOYLAN_00331235	IMG_2622.JPG	
	BOYLAN_00331236	BOYLAN_00331236	IMG_2623.JPG	
	BOYLAN_00331237	BOYLAN_00331237	IMG_2624.JPG	
	BOYLAN_00331238	BOYLAN_00331238	IMG_2625.JPG	
	BOYLAN_00331239	BOYLAN_00331239	IMG_2626.JPG	
	BOYLAN_00331240	BOYLAN_00331240	IMG_2627.JPG	
	BOYLAN_00331241	BOYLAN_00331241	IMG_2628.JPG	
	BOYLAN_00331242	BOYLAN_00331242	IMG_2629.JPG	
	BOYLAN_00331243	BOYLAN_00331243	activityAnalytics.png	
	BOYLAN_00331244	BOYLAN_00331244	address-entry.png	
	BOYLAN_00331245	BOYLAN_00331245	attachment.png	
	BOYLAN_00331246	BOYLAN_00331246	calendar.png	
	BOYLAN_00331247	BOYLAN_00331247	call.png	
	BOYLAN_00331248	BOYLAN_00331248	car-entry.png	
	BOYLAN_00331249	BOYLAN_00331249	chat.png	
	BOYLAN_00331250	BOYLAN_00331250	data-files.png	
	BOYLAN_00331251	BOYLAN_00331251	Deleted-icon.png	
	BOYLAN_00331252	BOYLAN_00331252	Deleted1.png	
	BOYLAN_00331253	BOYLAN_00331253	email-entry.png	
	BOYLAN_00331254	BOYLAN_00331254	email-read.png	
	BOYLAN_00331255	BOYLAN_00331255	email-sent.png	
	BOYLAN_00331256	BOYLAN_00331256	email.png	
	BOYLAN_00331257	BOYLAN_00331257	fax-entry.png	
	BOYLAN_00331258	BOYLAN_00331258	Forwarded.png	
	BOYLAN_00331259	BOYLAN_00331259	FromArrow.png	
	BOYLAN_00331260	BOYLAN_00331260	general-entry.png	
	BOYLAN_00331261	BOYLAN_00331261	google-earth.png	
	BOYLAN_00331262	BOYLAN_00331262	google-maps.png	
	BOYLAN_00331263	BOYLAN_00331263	goto.png	
	BOYLAN_00331264	BOYLAN_00331264	HeaderPdf.jpg	

CR 22-482-GW

Production Date: 12-16-2022

Production 015 (v036)

Local File Production	BOYLAN_00331265	home-entry.png	Discovery Index
BOYLAN_00331266	BOYLAN_00331266	infected.png	
BOYLAN_00331267	BOYLAN_00331267	Intact-icon.png	
BOYLAN_00331268	BOYLAN_00331268	ipconnection.png	
BOYLAN_00331269	BOYLAN_00331269	logolcon.png	
BOYLAN_00331270	BOYLAN_00331270	map-icon.png	
BOYLAN_00331271	BOYLAN_00331271	mobile-entry.png	
BOYLAN_00331272	BOYLAN_00331272	notes-entry.png	
BOYLAN_00331273	BOYLAN_00331273	office-entry.png	
BOYLAN_00331274	BOYLAN_00331274	organization.png	
BOYLAN_00331275	BOYLAN_00331275	pager-entry.png	
BOYLAN_00331276	BOYLAN_00331276	PrivateReplyIcon.png	
BOYLAN_00331277	BOYLAN_00331277	ReplyIcon.png	
BOYLAN_00331278	BOYLAN_00331278	Scrambled.png	
BOYLAN_00331279	BOYLAN_00331279	SentWithSiri.png	
BOYLAN_00331280	BOYLAN_00331280	skype.png	
BOYLAN_00331281	BOYLAN_00331281	star.png	
BOYLAN_00331282	BOYLAN_00331282	sub-element.png	
BOYLAN_00331283	BOYLAN_00331283	Tag.png	
BOYLAN_00331284	BOYLAN_00331284	ToArrow.png	
BOYLAN_00331285	BOYLAN_00331285	Unknown-icon.png	
BOYLAN_00331286	BOYLAN_00331286	warning-icon.png	
BOYLAN_00331287	BOYLAN_00331287	web-address-entry.png	
BOYLAN_00331288	BOYLAN_00331288	work-entry.png	
BOYLAN_00331289	BOYLAN_00331289	IMG_2614_thumb.jpg	
BOYLAN_00331290	BOYLAN_00331290	IMG_2615_thumb.jpg	
BOYLAN_00331291	BOYLAN_00331291	IMG_2619_thumb.jpg	
BOYLAN_00331292	BOYLAN_00331292	IMG_2620_thumb.jpg	
BOYLAN_00331293	BOYLAN_00331293	IMG_2621_thumb.jpg	
BOYLAN_00331294	BOYLAN_00331294	IMG_2622_thumb.jpg	
BOYLAN_00331295	BOYLAN_00331295	IMG_2623_thumb.jpg	
BOYLAN_00331296	BOYLAN_00331296	IMG_2624_thumb.jpg	
BOYLAN_00331297	BOYLAN_00331297	IMG_2625_thumb.jpg	
BOYLAN_00331298	BOYLAN_00331298	IMG_2626_thumb.jpg	

CR 22-482-GW

Production Date: 12-16-2022

Production 015 (v036)

Local File Production	BOYLAN_00331299	IMG_2627_thumb.jpg	Discovery Index
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BOYLAN_00331308	BOYLAN_00331308	Cellebrite_1B290_Snip from Timeline.PNG	
BOYLAN_00331309	BOYLAN_00331309	DerivativeEvidence_shipping_1B290.pdf	
BOYLAN_00331310	BOYLAN_00331310	Examination_of_1B518.pdf	
BOYLAN_00331311	BOYLAN_00331312	HQQ190927003AGK_1B290.pdf	
BOYLAN_00331313	BOYLAN_00331313	.uuid	
BOYLAN_00331314	BOYLAN_00331314	HQQ030328_1.jpg	
BOYLAN_00331315	BOYLAN_00331315	HQQ030328_2.jpg	
BOYLAN_00331316	BOYLAN_00331316	HQQ031144_1.jpg	
BOYLAN_00331317	BOYLAN_00331317	HQQ031144_2.jpg	
BOYLAN_00331318	BOYLAN_00331318	HQQ031144_3.jpg	
BOYLAN_00331319	BOYLAN_00331319	HQQ031144_4.jpg	
BOYLAN_00331320	BOYLAN_00331320	HQQ031144_5.jpg	
BOYLAN_00331321	BOYLAN_00331323	HQQ190927003_CaseNotes.pdf	
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BOYLAN_00331327	BOYLAN_00331327	HQQ021385_1B134_1.jpg	
BOYLAN_00331328	BOYLAN_00331328	HQQ021385_1B134_2.jpg	
BOYLAN_00331329	BOYLAN_00331329	HQQ021385_1B134_3.jpg	
BOYLAN_00331330	BOYLAN_00331330	HQQ021386_1B136_1.jpg	
BOYLAN_00331331	BOYLAN_00331331	HQQ021386_1B136_2.jpg	
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BOYLAN_00331333	BOYLAN_00331333	HQQ021387_1B117_2.jpg	
BOYLAN_00331334	BOYLAN_00331334	HQQ021389_1B137_1.jpg	
BOYLAN_00331335	BOYLAN_00331335	HQQ021389_1B137_2.jpg	
BOYLAN_00331336	BOYLAN_00331336	HQQ021390_1B129_1.jpg	
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BOYLAN_00331338	BOYLAN_00331338	HQQ021390_1B129_3.jpg	
BOYLAN_00331339	BOYLAN_00331339	HQQ021391_1B118_1.jpg	

CR 22-482-GW

Production Date: 12-16-2022

Production 015 (v036)

BOYLAN_00331340	BOYLAN_00331340	HQQ021391_1B118_2.jpg
BOYLAN_00331341	BOYLAN_00331341	HQQ022878_SIM 1B119_1.jpg
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BOYLAN_00331355	BOYLAN_00331355	HQQ022883_SIM 1B129_3.jpg
BOYLAN_00331356	BOYLAN_00331356	Report_of_Lead_Coverage_Photos.pdf
BOYLAN_00331357	BOYLAN_00331358	HQQ220830004CHAPPELL_1B519.pdf